



UNITED STATES DEPARTMENT OF COMMERCE
National Telecommunications and
Information Administration
Washington, D.C. 20230

JUL 12 2004

Mr. Edmond J. Thomas
Chief, Office of Engineering and Technology
Federal Communications Commission
445 12th Street, N.W.
Washington, DC 20554

RE: *Amendment of Parts 13 and 80 of the Commission's Rules Concerning Maritime Communications*, Second Report and Order, Sixth Report and Order, and Second Further Notice of Proposed Rulemaking, WT Docket No. 00-48, FCC 04-3.

Dear Mr. Thomas:

The National Telecommunications and Information Administration (NTIA), an Executive Branch agency within the Department of Commerce, manages and authorizes the Federal Government's use of the radio frequency spectrum. The Federal Communications Commission (FCC) recently issued a document via the Federal Register seeking comments and reply comments regarding the Amendment of Parts 13 and 80 of the Commission's Rules Concerning Maritime Communications. NTIA submitted comments on the above-referenced on June 7, 2004. I hereby forward the attached reply comments that were submitted by the United States Coast Guard to NTIA on the above-referenced document.

NTIA looks forward to working with the FCC on this item. If you have any questions regarding these reply comments, please contact Gary Patrick, Spectrum Engineering and Analysis Division, or my staff at (202) 482-9132.

Sincerely,

Fredrick R. Wentland
Associate Administrator
Office of Spectrum Management

Enclosure



2400
12 July 2004

Mr. Frederick R. Wentland
Associate Administrator, Office of Spectrum Management
National Telecommunications and Information Administration
Herbert C. Hoover Building
14th and Constitution Avenue, N.W.
Washington, D.C. 20360

Dear Mr. Wentland:

The Coast Guard respectfully submits these Reply Comments in response to the FCC Request for comments published in the Federal Register on April 6, 2004 (69 FR 18007, WT Docket No. 00-48.)

The Coast Guard supports the comments of Any La Varra PE¹ regarding adoption of the Class "D" VHF-DSC standard. A Class "D" radio offers enhancements over radios constructed to the RTCM SC101 standard included in current Commission rules..

We urge the Commission to reject the comments of the North Pacific Marine Radio Council (NPMRC)² and the Passenger Vessel Association³ (PVA) to permit the continued use of Non-DSC equipped radios beyond the Commission's proposed date. DSC offers enhanced distress alerting over other methods and is an essential element of the Coast Guard's new RESCUE 21 VHF FM system. RESCUE 21 is an ongoing nationwide program to replace the aged existing Coast Guard VHF FM system with modern equipment and enhanced capabilities. Given DSC's obvious safety benefits, we believe that the continued implementation of DSC on the existing timeline is important to improving safety for the maritime community. Further, in response to NPMRC's concerns, we note IEC 62238 compliant radios are specifically designed to avoid the problem of interruption "by DSC channel switching or alarms."

The Coast Guard supports the comments of the National GMDSS Task Force⁴ (GMDSSTF) as well as the comments provided by the Radio Technical Commission for Maritime Services⁵ (RTCM). We note that both sets of comments were developed and approved by consensus of their maritime related members.

¹ Undated Brief Comments of Any La Varra PE filed 6/7/04

² NPMRC Comments 6/4/04 at "A"

³ PVA Comments 6/7/04

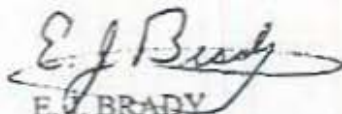
⁴ National GMDSS TF Comments 6/7/04

⁵ RTCM Comments 6/4/04

The Coast Guard strongly recommends the Commission reject MariTEL's⁶ comments regarding the elimination of 47 C.F.R. § 207(d) emission designators to the extent they do not relate to distress communications. The Coast Guard believes that such action would be premature. We believe further that, until such time as appropriate rules governing new technologies are developed and promulgated the elimination of existing emission designators would adversely affect interoperability, and could have adverse effects on the safety of the maritime public, and further could potentially affect other sovereign states. We note, moreover that elimination of emission requirements would place the United States out of compliance with the International Telecommunications Union's International Radio Regulations.

We partially concur with the recommendation of the National Transportation Safety Board⁷ (NTSB) to require installation of a reserve power source on currently exempted small passenger vessels. We recommend, however, that in lieu of simply deleting the tonnage requirement contained in 47 CFR 80.917, that the Commission modify its proposal to require installation of a reserve power supply on "Small passenger vessels operating on the high seas or more than 3 miles from shore on Great Lakes Voyages"⁸. This change would provide necessary balance between enhanced maritime safety and economic burden.

Sincerely,



E. J. BRADY

Spectrum Management Division
By direction of the Commandant

⁶ Marital Comments 6/4/04 at II

⁷ NTSB Recommendation M-02-17

⁸ CG NVIC 3-99, Table 3, note 9